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December 3, 2020

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

Re: *Commodities & Minerals Enterprise Ltd. v. CVG  
Ferrominera Orinoco, C.A.*, No. 19 Civ. 11654

Dear Judge Carter:

We represent Plaintiff Commodities & Minerals Enterprise Ltd. ("CME") in the above-referenced proceeding and, on behalf of our client, write to respectfully request three corrections to the November 30, 2020 opinion and order (Dkt. #40) and accompanying clerk's judgment (Dkt. #41) issued in this case earlier this week as follows, with CME's proposed corrections underlined below:

1. In the opinion and order (Dkt. #40), at page 11 of the slip opinion in the second sentence of the last paragraph on that page, we respectfully request that "CMO" be replaced with "FMO" so that the sentence reads: "This is fatal to FMO's argument."
2. In the opinion and order (Dkt. #40), in the Conclusion on page 13 at the second sentence, we respectfully request that FMO be replaced with the party name so that the sentence reads in relevant part: "The Court respectfully directs the Clerk of Court to enter judgment against Respondent CVG Ferrominera Orinoco, C.A., including interest . . ."
3. In the Clerk's Judgment (Dkt. #41), we respectfully request that the abbreviations be replaced with the party names, so that the judgment reads as follows:

"It is hereby ORDERED, ADJUDGED AND DECREED: That for the reasons stated in the Court's Opinion and Order dated November 30, 2020, the Court grants Petitioner Commodities & Minerals Enterprise Ltd.'s ("CME") petition to confirm the Award; judgment is entered against Respondent CVG Ferrominera

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Orinoco, C.A. (“FMO”), including interest on \$12,655,594.36 at 5.50% per annum from December 20, 2018 until the date of Judgment in the amount of \$1,357,789.25 for a total sum of \$14,013,383.61. The Court grants the requests for attorneys’ fees arising from the proceeding. CME must file its motion for attorneys’ fees by December 21, 2020. FMO may oppose that motion by January 6, 2021. CME may make any reply by January 13, 2021.”

We thank the Court for its consideration of this matter.

Respectfully yours,

s/ *Bruce G. Paulsen*

Bruce G. Paulsen